

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ARLETA MONGUE, individually and on
behalf of the Class,

Plaintiff,

v.

THE WHEATLEIGH CORPORATION,
L. LINFIELD SIMON, SUSAN SIMON,
and MARC WILHELM

Defendants.

CIVIL ACTION NO.: 3:18-cv-30095

AFFIDAVIT OF ARLETA MONGUE

I, Arleta Mongue, under oath, depose and say as follows:

1. I am the named Plaintiff of the above-captioned action, and I have personal knowledge of the matters stated below.

2. I submit this affidavit in support of the Motion for Final Approval of the Class Action Settlement.

3. At all times, counsel consulted me in connection with settlement discussions.


4. I am and have been aware of the material terms of the settlement and approved the terms of the settlement in this case before my attorney conveyed acceptance to opposing counsel in December 2021.

5. I understood that the settlement included funds that were designated for the settlement of the related cases filed by other former Wheatleigh employees: Mark Brown (“Brown”) (Case No. 3:18-cv-30056-KAR), Christian Perreault Hamel (“Hamel”) (Case No. 3:18-cv-30113-KAR), and Mary Harris (“Harris”) (Case No. 3:18-cv- 30114-KAR),

6. I also understood how those funds were being allocated and the reasons for the allocation and approved the settlement.

7. I was and remain in full support of the settlement reached.

SUBSCRIBED and SWORN, under pains and penalties of perjury this 15 day of November 15, 2023.



Arleta Mongue